

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TERRY W. BETTIS, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

**ENVISION HEALTHCARE
CORPORATION f/k/a ENVISION
HEALTHCARE HOLDINGS, INC.,
CHRISTOPHER A. HOLDEN, WILLIAM A.
SANGER, CLAIRE M. GULMI and
RANDEL G. OWEN,**

Defendants.

Case No. 3:17-CV-01112

Chief Judge Waverly D. Crenshaw, Jr.

Magistrate Judge Jeffrey S. Frensley

**JOINT MOTION TO POSTPONE
THE INITIAL CASE MANAGEMENT CONFERENCE**

Plaintiff Terry W. Bettis (“Plaintiff”) and Defendants Envision Healthcare Corporation f/k/a Envision Healthcare Holdings, Inc. (“Envision”), Christopher A. Holden, William A. Sanger, Claire M. Gulmi, and Randel G. Owen (collectively, “Defendants”) hereby move the Court to postpone the Initial Case Management Conference currently set for Thursday, October 5, 2017 at 10:00 a.m. in Courtroom 661 before Magistrate Judge Chip Frensley, showing the Court as follows:

1. On August 4, 2017, Plaintiff filed the Complaint, which is a putative class action complaint for alleged violations of the federal securities laws that is subject to Section 21D of the Securities and Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “Reform Act”), 15 U.S.C. §78u-4.

2. Pursuant to the Reform Act, members of the putative class are entitled to move for appointment as lead plaintiff on or before October 3, 2017, and the Court must take under submission and rule on any motions for lead plaintiff and lead counsel thereafter. *See* 15 U.S.C. § 78u-4(a)(3). Because any member of the putative class may move for lead plaintiff appointment, it is unknown at this stage who the movants will be, or who will be appointed as lead plaintiff and lead counsel. The law firm appointed lead counsel will need to appear at the Initial Case Management Conference.

3. For these reasons and in the interest of judicial efficiency, the parties request that the Court postpone the Initial Case Management Conference until the Court considers any motion(s) filed and appoints a lead plaintiff and lead counsel pursuant to the provisions of the Reform Act.

WHEREFORE, the parties respectfully request that the Court enter the Proposed Order filed simultaneously herewith.

Respectfully submitted this 29th day of August, 2017. The Filing User hereby represents that all signatories hereto consent to the filing of this document.

/s/Paul K. Bramlett

Paul K. Bramlett
(BPR # 7387)
Robert P. Bramlett
(BPR # 25895)
Bramlett Law Offices
40 Burton Hills Blvd., Suite 200
Post Office Box 150734
Nashville, TN 37215
Tel. (615) 248-2828
pknashlaw@aol.com
robert@bramlettlawoffices.com

Jeremy A. Lieberman
(admitted *pro hac vice*)
J. Alexander Hood II
(admitted *pro hac vice*)
Pomerantz LLP
600 Third Ave. 20th floor
New York, NY 10016
Tel. (212) 661-1100
jalieberman@pomlaw.com
ahood@pomlaw.com

Patrick V. Dahlstrom
(admitted *pro hac vice*)
Pomerantz LLP
10 South La Salle St, Ste. 3505
Chicago, IL 60603
Tel. (312) 377-1181
pdahlstrom@pomlaw.com

Attorneys for Plaintiff

/s/Britt K. Latham

Britt K. Latham
(BPR # 23149)
W. Brantley Phillips, Jr.
(BPR # 18844)
Joseph B. Crace, Jr.
(BPR # 27753)
Bass, Berry & Sims, PLC
150 Third Avenue, South, Suite 2800
Nashville, TN 37201
Tel. (615) 742-7762
blatham@bassberry.com
bphillips@bassberry.com
jcrace@bassberry.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2017, the foregoing JOINT MOTION TO POSTPONE INITIAL CASE MANAGEMENT CONFERENCE was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Paul K. Bramlett
Robert P. Bramlett
Bramlett Law Offices
40 Burton Hills Blvd., Suite 200
Post Office Box 150734
Nashville, TN 37215
Tel. (615) 248-2828
pknashlaw@aol.com
robert@bramlettlawoffices.com

Jeremy A. Lieberman
J. Alexander Hood II
Pomerantz LLP
600 Third Ave. 20th floor
New York, NY 10016
Tel. (212) 661-1100
jalieberman@pomlaw.com
ahood@pomlaw.com

Patrick V. Dahlstrom
Pomerantz LLP
10 South La Salle St, Ste. 3505
Chicago, IL 60603
Tel. (312) 377-1181
pdahlstrom@pomlaw.com

Attorneys for Plaintiff

/s/ Britt K. Latham